

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtor.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

INFORMATIVE MOTION REGARDING MARCH 23-24, 2022 HEARING

TO THE HONORABLE COURT:

PLEASE TAKE NOTICE that, pursuant to this Court's *Order Regarding Procedures for March 23-24, 2022, Omnibus Hearing* [Dkt. No. 20323], counsel for Unión de Trabajadores de la Industria Eléctrica y Riego Inc. ("UTIER") and Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica ("SREAAEE") hereby respectfully state as follows:

1. Jessica E. Méndez-Colberg and Rolando Emmanuelli-Jiménez of Bufete Emmanuelli, C.S.P., will appear on behalf of Utier and SREAAEE on March 23, 2022, Omnibus Hearing ("Hearing") which will be conducted virtually via Zoom and telephonic platforms, and to the extent necessary, will present argument.

2. The email address of Ms. Jessica E. Méndez Colberg is jessica@emmanuelli.law and the email address of Mr. Rolando Emmanuelli Jiménez is rolando@emmanuelli.law.

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's Federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 04780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

3. If necessary and/or if required by the Court, counsel for UTIER and SREAAEE will particularly address all matters related to the *Joint Reservation of Rights and Request for Relief of Unión de Trabajadores de la Industria Eléctrica y Riego, Inc. (UTIER) and Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica (SREAAEE) Regarding Urgent Motion of the Ad Hoc Group of PREPA Bondholders Pursuant to Section 312 of PROMESA and Section 105 of the Bankruptcy Code to Appoint a Mediator and Impose Deadlines for a PREPA Plan of Adjustment* Doc#:2718, ECF No. 2724 in Case No. 17-04780, as well as any other Status Report or motion further filed with regards to the mediation of a PREPA Plan of Adjustment.

4. Because the Agenda for the Hearing has not yet been issued, UTIER and SREAAEE reserve the right to present argument at the Hearing concerning any of the matters outlined in the Agenda that may impact UTIER's and SREAAEE's rights.

5. In the event, there is a matter included in the Agenda that requires argument from UTIER and/or SREAAEE, an amended motion will be filed consistent with the Hearing Procedures Order.

6. Counsel will be prepared to respond to any matters raised by the Court or to any statements made by any party in connection with the above-captioned Title III proceedings or any adversary proceedings currently pending in the above-captioned Title III proceedings.

WHEREFORE, UTIER and SREAAEE respectfully request that the Court take notice of the above stated.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and Standard Parties. A courtesy copy of this Motion will be delivered to the Court by email to SwainDPRCorresp@nysd.uscourts.gov as provided in *First Amended Standing Order*.

In Ponce, Puerto Rico, this 17th day of March 2022.



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